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BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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MAR 10 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of § 73.202(b),) RM-
Table of Allotments,) MM Docket No.
FM Broadcast Stations)
(Moberly, Missouri))

To: Chief, Allocations Branch
Policy and Rules Division

PETITION FOR RULE MAKING AND
REQUEST FOR MODIFICATION OF LICENSE

FM 105, Inc. ("FM 105"), licensee of Station KZZT(FM),
Moberly, Missouri, by its attorney and pursuant to Section 1.401
of the Commission's Rules, hereby respectfully requests: (a)
that the FM Table of Allotments be amended to substitute Channel
288C2 in lieu of Channel 288C3 at Moberly, Missouri; and (b) that
FM 105's License for Station KZZT be modified, pursuant to
Section 316(a) of the Communications Act of 1934, as amended, and
Section 1.420(g) of the Commission's Rules, to specify operation
on Channel 288C2 in lieu of Channel 288C3. In support whereof,
the following is shown:

As demonstrated in the attached Engineering Statement
prepared by Doug C. McDonell, Technical Consultant, Channel 288C2

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can be assigned to Moberly in full compliance with the Commission's minimum distance separation requirements.

It is submitted that the upgrading of Station KZZT would be in the public interest. Operating with Class C2 facilities, the Station would serve a larger population and area in rural north central Missouri than is currently served. FM 105 hereby represents that it will proceed to construct Class C2 facilities promptly upon issuance by the Commission of the appropriate authorization.

Section 1.420(g) of the Commission's Rules provides that in response to a petition for rulemaking filed by a licensee of an FM station to allot a mutually exclusive higher class adjacent or co-channel FM channel to its proposed community of license, the Commission may modify the petitioner's license to specify operation on the newly allotted channel.

WHEREFORE, for the reasons discussed above, it is respectfully requested that the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, be amended as follows:

<u>City</u>	<u>Delete Channel No.</u>	<u>Add Channel No.</u>
Moberly, MO	288C3	288C2

It is further respectfully requested that FM 105's license for Station KZZT be modified to reflect operation on

Channel 288C2 at the time this Channel is added to the FM Table
of Allotments.

Respectfully submitted,

FM 105, INC.

By: John R. Wilner
John R. Wilner

Its Attorney

Bryan Cave
700 Thirteenth Street, N.W.
Suite 700
Washington, DC 20005-3960
(202) 508-6000

Dated: March 10, 1993

JRW/028044
0045314.01

TECHNICAL STATEMENT

FM 105, INC.

KZZT

MOBERLY, MISSOURI

This technical statement has been prepared on behalf of FM-105, Inc., licensee, under BMLH-891213KC, of radio station KZZT, Moberly, Missouri. FM-105, Inc. is also the permittee, under BPH-911030IB, to upgrade from Class A to Class C3 on Channel 288.

It is now proposed to amend Section 73.202(b) of the Rules to allot Channel 288C2 to Moberly and reserve its use for KZZT. From the reference point shown on the attached Channel Study, adequate separation can be provided to all known stations, allotments, and proposals.

There is an apparent short-spacing to the licensed facilities of radio station KXXK, Knob Noster, Missouri. However, by action in Docket 89-550, KXXK was authorized to modify its facilities from Channel 288A to Channel 289C3. KXXK filed a license application for Channel 289C3 on May 1, 1992 and is apparently now operating under automatic program test authority. KXXK has also proposed a further upgrade from Channel 289C3 to Channel 289C2. This later proposal is adequately separated from the Moberly reference point.

The attached map shows the city of Moberly and the reference point used for the Channel Study. From this location, the predicted 70 dBu contour will encompass the city of license.

930226

DOUG C. MC DONELL
TECHNICAL CONSULTANT
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MADISON, WI 53711

Because FM-105, Inc. has authorized preparation of this technical statement and has filed it with the Commission, it is apparent there is intent to apply for, and construct Class C2 facilities when Channel 288C2 is allotted to Moberly, Missouri.

This technical statement has been prepared by me and is true of my knowledge, except as to such statements based on information provided, which I believe to be true.

26 February 1993



Doug C. McDonell

SINGLE CLASS CHANNEL STUDY
 FM CHANNEL 288 C2 105.5 MHZ
 MOBERLY, MISSOURI
 SEARCHING: MO,IA,IL,AR,OK,KS,NE

DATABASE DATE: 01-27-1993
 RUN DATE: 02-26-1993

LATITUDE: 39 25 45
 LONGITUDE: 92 22 49

****STUDY USES 6 KW CLASS A SEPARATIONS****

CHANNEL & CLASS	CALL	STATUS	CITY	ST	COORDINATES	MINIMUM KM	CALCULATED KM (MI)
234			NONE				
235			NONE				
285			NONE				
286			NONE				
287C1		USED	Rolla	MO	375239 914445	158	180.9(112.4)
287C1	KZNN	LIC	Rolla	MO	375239 914445	158	180.9(112.4)
<u>1/</u> *288A	KXXK	LIC	Knob Noster	MO	384628 933734	166	130.0(80.8)
*288C3	KZZT	CP	Moberly	MO	392454 922436	177	3.0(1.9)
*288C3		USED	Moberly	MO	392454 922436	177	3.0(1.9)
*288A	KZZT	LIC	Moberly	MO	392454 922436	166	3.0(1.9)
288A	KELR-FM	LIC	Chariton	IA	410050 931723	166	192.2(119.5)
288A	KILJ-FM	LIC	Mount Pleasant	IA	405632 913408	166	181.7(112.9)
288C3 DS	KILJ-FM	CP	Mount Pleasant	IA	405655 913355	177	182.4(113.4)
288C3		USED	Mount Pleasant	IA	405404 912621	177	182.0(113.1)
288A	WJVO	LIC	South Jacksonvi	IL	394320 901143	166	190.5(118.4)
288A		USED	South Jacksonvi	IL	394320 901143	166	190.5(118.4)
289C3		USED	Knob Noster	MO	384628 933734	117	130.0(80.8)
289C3	KXXK	CP	Knob Noster	MO	384628 933734	117	130.0(80.8)
289C3	KXXK	DEL	Knob Noster	MO	384628 933734	117	130.0(80.8)
289C2	KXXK	ADD	Knob Noster	MO	384628 933734	130	130.0(80.8)
289C		USED	St. Genevieve	MO	381310 903544	188	205.1(127.5)
289C	KFXB	LIC	St. Genevieve	MO	381310 903544	188	205.1(127.5)
290			NONE				
291C2		DEL	Ashland	MO	384629 923322	58	74.2(46.1)
291C1		ADD	Ashland	MO	384339 924039	79	82.0(51.0)
291C2		USED	Ashland	MO	384407 921853	58	77.2(48.0)
291C2	KYUA	CP	Ashland	MO	384629 923322	58	74.2(46.1)
291C2	KYUA	APP	Ashland	MO	384629 923322	58	74.2(46.1)

NONE indicates clearance within a 32 km (20 mi)
 extension of the required minimum separation.

DS indicates a Directional Antenna under
 Section 73.215 (SHORT SPACED) is used.

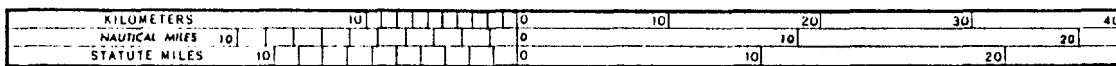
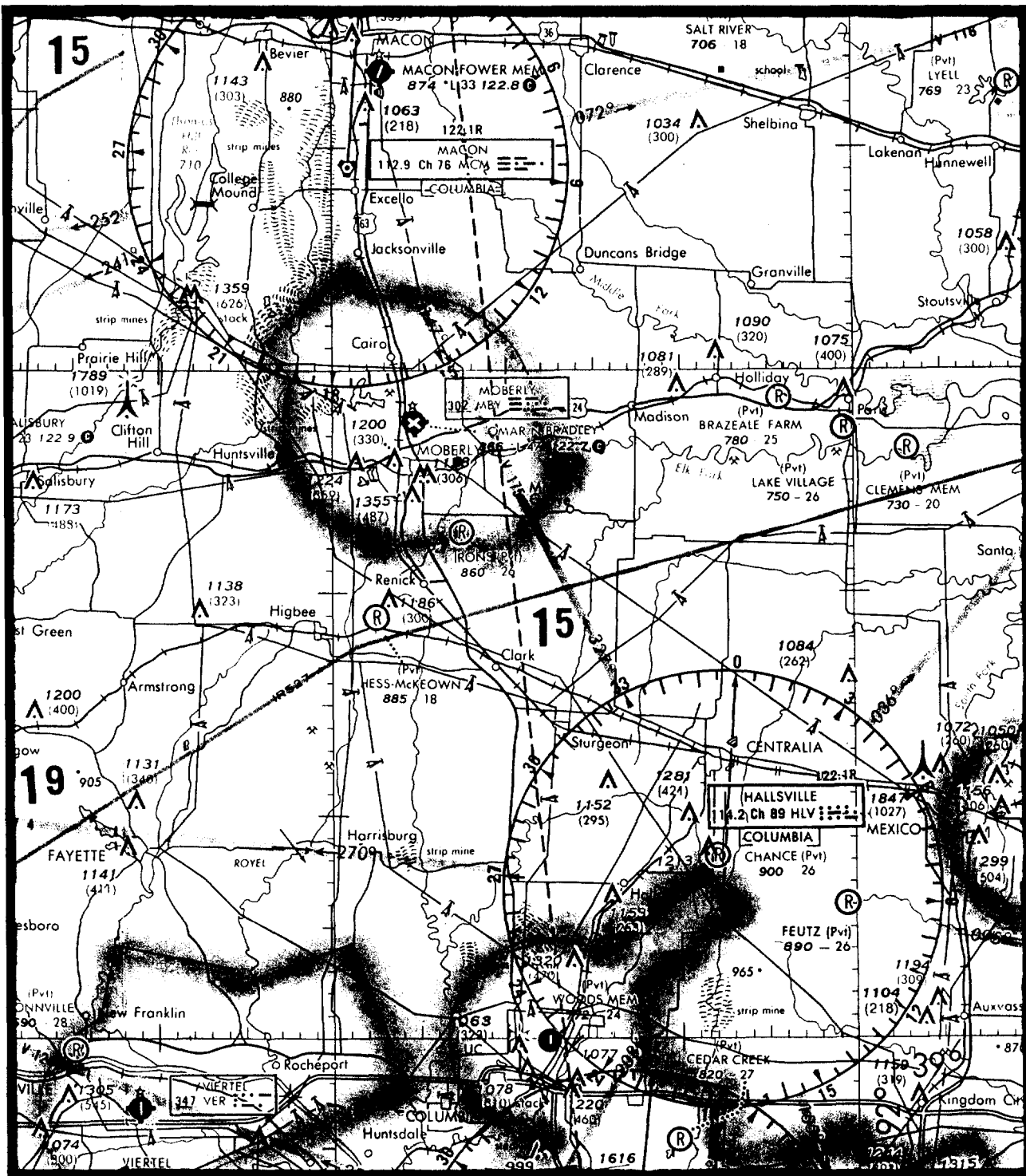
The data used in this study is taken from the FCC FM Engineering Database released by the Commission on 01-27-1993. The data is considered as a secondary source and may not agree with information contained in the primary source (see Section 0.434(e) of the Rules).

Doug C. McDonell, Technical Consultant does not assume any responsibility for erroneous or incomplete data contained in the FCC Database.

1/ See Text

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CITY AND REFERENCE POINT
FM-105, INC.
MOBERLY, MISSOURI



9 3 0 2 2 6

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MADISON, WI 53711

CALL: KKKX
STATUS: CP SERVICE CLASS:FM
CITY: Knob Noster
STATE: MO COUNTRY:U
CHANNEL: 289 FREQUENCY:105.7
CLASS: C3
LATITUDE: 38-46-28
LONGITUDE: 93-37-34
POWER: 13.5
HAAT: 89
C OF R AMSL: 328 BEAM TILT:N
C/P 73.215: N
D/A: N
D/A MAKE: D/A MODEL: D/A ROTATE:
REF. NO.: BPH911004IE
DOCKET NO.:
WINDOW OPENS: CUTOFF DATE:
CP EXPIRES: 930716 LIC. APP. FILED: 920501 307 FILED:
OWNER: Bick Broadcasting Company
UPDATE DATE: 921004 MAINKEY: 5E6DE0600095089B
COMMENTS:
From Channel 288A per D89-550

CALL: KKKX
STATUS: ADD SERVICE CLASS:FR
CITY: Knob Noster
STATE: MO COUNTRY:U
CHANNEL: 289 FREQUENCY:105.7
CLASS: C2
LATITUDE: 38-46-28
LONGITUDE: 93-37-34
POWER:
HAAT: 0
C OF R AMSL: BEAM TILT:N
C/P 73.215: N
D/A: N
D/A MAKE: D/A MODEL: D/A ROTATE:
REF. NO.: RM8021
DOCKET NO.: 92-156
WINDOW OPENS: R. M. PET. FILED:
CP EXPIRES: LIC. APP. FILED: 307 FILED:
OWNER: Bick Broadcasting Company
UPDATE DATE: 920728 MAINKEY: 964F14A00095CA05
COMMENTS:
PRM

980226

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